

**Remarks**

Reconsideration and allowance of this application, as amended, are respectfully requested.

Claims 1, 8-10, 15, 17, and 21 have been amended in response to the examiner's objections. Claims 1 and 3-21 remain pending in the application. Claims 1 and 15 are independent. The objections and rejections are respectfully submitted to be obviated in view of the amendments and remarks presented herein. No new matter has been introduced through the foregoing amendments. Entry of each of the amendments is respectfully requested.

35 U.S.C. § 103(a) - Achelpohl and Elia

Claims 1 and 3-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,816,163 to Achelpohl et al. (hereinafter "Achelpohl") in view of U.S. Patent No. 5,213,044 to Elia et al. ("Elia").

The rejection of claims 1 and 3-21 under § 103(a) based on Achelpohl and Elia is respectfully traversed. For at least all of the reasons explained in Applicants' reply filed May 22, 2007, and the following reasons, the combined disclosures of Achelpohl and Elia would not have rendered obvious Applicants' claimed invention.

First, the asserted combination of Achelpohl and Elia does not disclose each feature of the claimed invention. More specifically, the disclosure of Elia does not rectify the

deficiencies of Achelpohl. Second, there is no teaching in either reference that would have led one to select the references and combine them in a way that would produce the invention defined by any of Applicants' pending claims.

As explained in Applicants' previous reply, claim 1 defines a process that includes cleaning each roller in succession. That is, a first roller (e.g., a screen roller) is kept in contact with the ink blade chamber. At that point, however, no other roller is in contact with the first roller. After having cleaned the first roller sufficiently, a second roller (e.g., an ink transfer roller) is brought into contact with the first roller. Except for the first roller, no other roller is then in contact with the second roller. After having cleaned the second roller, a third roller can be brought into contact with the second roller (which is in contact with the first roller) in order to clean the third roller, and so on. By virtue of Applicants' claimed process, a more effective cleaning of all of the rollers is achieved.

The combined disclosures of Achelpohl and Elia do not teach all of Applicants' claim features. Achelpohl teaches that the ink in a printing machine's doctor blade chamber can be evacuated via a pumping system. Afterwards, the chamber is refilled with solvent so that the chamber itself and the corresponding anilox cylinder can be cleaned.

Elia does not rectify the deficiencies of Achelpohl. Elia simply teaches a comparable cleaning process for the doctor blade chamber. As explained previously, Elia teaches placing a transfer roll into a thrown-on position, which causes the cleaning fluid to be transferred to each roller between the transfer roll and the web. Therefore, according to Elia's disclosure, all of the rollers are cleaned simultaneously. That is not Applicants' claimed invention. Unlike Achelpohl's process, Elia's doctor blade chamber is refilled by a special cleaning fluid before the cleaning process is started (column 1, lines 42-45). In order to avoid contact of the cleaning fluid with the rollers that bear the printing image, the rollers must have a gap between them and the last roller to be cleaned (see column 4, lines 10-30). The printing image will be damaged or even destroyed if it is allowed to contact the cleaning fluid.

Furthermore, there is no teaching in either Achelpohl or Elia that would have led one to select the references and combine them in a way that would result in the process according to claims 1 and 15 in which each roller is cleaned in succession. That is, a feature of Applicants' claimed invention is successively establishing communication between a cleaned roller and the rollers still to be cleaned, i.e., a step-by-step cleaning process. Only when one roller has been cleaned sufficiently is the next roller brought into contact with the cleaned roller, and so on. A person having ordinary skill in the art would not combine Achelpohl with

U.S. Appln. No.: 10/529,553  
Atty. Docket No.: P70352US0

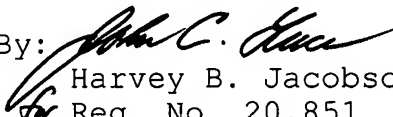
Elia because it is clear that the result is not a process that includes cleaning each roller in succession.

Accordingly, the combined disclosures of Achelpohl and Elia would not have rendered obvious the invention defined by any of Applicants' pending claims.

In view of the foregoing, this application is now in condition for allowance. If the examiner believes that an interview might expedite prosecution, the examiner is invited to contact the undersigned.

Respectfully submitted,

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Date: February 5, 2008